PHARMACIA

Pharmacia Corporation
P.O. Box 5110
Chicago, Illinois 60680-5110
tel 847.982.7000
www.pharmacia.com

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1060
Rockville, MD 20852.

Dear Dockets Manager,

Listed below are comments and suggestions from the Pharmacia Corporation on "Guidance for Industry, 21 CFR Part 11; Electronic Records; Electronic Signatures, Glossary of Terms" and "Guidance for Industry, 21 CFR Part 11; Electronic Records; Electronic Signatures, Validation". The docket number for each draft guidance is included. We welcome and appreciate the chance to provide feedback.

Guidance for Industry
21 CFR Part 11; Electronic Records; Electronic Signatures
Glossary of Terms (Docket 00D-1543)
Term: Off-the-Shelf Software
A change of the wording from "which the user can not claim complete software life cycle control" to "which the user can not claim software life cycle control" is suggested. The former wording would imply that contracted programming companies would produce "Off-the-Shelf Software".

Guidance for Industry
21 CFR Part 11; Electronic Records; Electronic Signatures
Validation (Docket 00D-1538)
In general, the guidance offered on validation is presented so it appears to apply beyond systems employing electronic records and electronic signatures. Most of the topics presented address computer system validation as a whole and do not represent specific part 11 topics. Publishing this information under the umbrella of 21 CFR Part 11 guidance may in fact raise expectations for validation approaches for all FDA regulated software. It would be helpful for FDA to clarify if this is the intent.

00D-1543

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In section 2.1, it is suggested the wording change to provide clarity from "This draft guidance applies to electronic records and electronic signatures that persons create, modify, maintain, archive, retrieve, or transmit under any records or signature requirement set forth in the Federal Food, Drug, and Cosmetic Act (the Act), the Public Health Service Act (PHS Act), or any FDA regulation." to "This draft guidance applies to computer systems where persons create, modify, maintain, archive, retrieve, or transmit any electronic records or electronic signatures in requirements set forth in the Federal Food, Drug, and Cosmetic Act (the Act), the Public Health Service Act (PHS Act), or any FDA regulation." The guidance will be applied to validation of systems that manage records and records, not to the validation of records and signatures.

In section 4, it is noted part 11 explicitly calls for "validation of systems to ensure accuracy, reliability, consistent intended performance, and the ability to discern invalid or altered records." The guidance does not speak to the issue of how to determine if a system can discern invalid or altered records. For example, in section 6.2.1, guidance is offered on system requirement specifications detailing what types of measures that would be sufficient to ensure accurate, complete and timely transfer of data and records from source to destination computing systems. For determining invalid or altered records, it would be useful to outline which of the controls for closed systems are sufficient to illustrate this ability.

In section 5.2, FDA discusses requirements for systems and refers to part 11 section 11.10 wording as a example of general requirements. Section 11.10 includes the phrase "...and to ensure that signers cannot readily repudiate signed records as not genuine." Using this as an example requirement is confusing, since it employs wording that is not testable. It would be more useful for FDA to point out what collective controls in part 11 are required to assure signers can't readily repudiate signed records as not genuine.

In section 5.7, FDA suggests that "where possible, and especially for higher risk applications, computer system validation should be performed by persons other than those responsible for building the system." In 21 CFR Part 11, the term 'persons' has been used to refer to personnel that are a portion of an overall corporate entity. The term here would seem to imply that validation be performed by someone other than personnel in the corporation that built the system. The second of two approaches suggested by FDA in the guidance clarifies that use of personnel within the same organization for validation is acceptable. To be consistent, it is suggested FDA not use the term 'persons' in the fashion it is used in 5.7.

In section 6.2, FDA describes validation of systems employing the Internet. In that section, they suggest use of digital signatures to verify that records have not been altered and that the sender's authenticity is affirmed. In many past forums, FDA has represented that a primary issue of record integrity when using the Internet focuses on circumstances where records are "stored and forwarded" on open systems. It would be useful for FDA to describe the suggested controls in terms of open and closed systems, and amplify if digital signatures are recommended even under circumstances that records are not "stored and forwarded" during transmission.

Sincerely,

John Boettcher
Lead, Pharmacia 21 CFR Part 11 Program Office
john.l.boettcher@pharmacia.com